

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

MELISA INGRAM, STEPHANIE  
WILSON, and ROBERT REEVES,

Case No. 2:20-cv-10288

Plaintiffs,

Hon. Arthur J. Tarnow

v.

Mag. Judge Elizabeth A. Stafford

COUNTY OF WAYNE,

Defendant.

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**RESPONSE TO THE LETTER DATED MAY 13, 2021  
FILED BY PLAINTIFF STEPHANIE WILSON  
BY DEFENDANT WAYNE COUNTY**

Although it is true that the Wayne County Circuit Court did grant summary disposition to Claimant Stephanie Wilson in a written Order dated April 30, 2021,<sup>1</sup> and did orally deny the Wayne County Prosecutor's Motion for Reconsideration and for Stay on May 13, 2021 (although a written order confirming these latter oral pronouncements has not yet been entered), the Wayne County Prosecutor is appealing and will be seeking review of the state trial court's arguably erroneous application of Mich. Comp. Laws § 333.7521 et seq. to the facts of Wilson's case.

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<sup>1</sup> Wilson did not submit her proposed order on summary disposition under Michigan's seven-day rule under Mich. Ct. R. 2.602(B)(3), and the state trial court signed it the day following the hearing presumably pursuant to Mich. Ct. R. 2.602(B)(1), without the Wayne County Prosecutor having the normal period to review and/or object to its proposed form.

To the extent that Wilson represents, without providing the actual transcript of the proceedings on May 13, 2021, that the state trial court opined that the existence of her later-filed federal case had a material impact on its legal rulings, those representations are not accurate. When the official transcripts from the two state court hearings become available, Wayne County can provide these to the Court.

As stated in Wayne County's prior filing dated May 6, 2021, federal law uniformly holds that *Younger* and *Colorado River* abstention continues through the conclusion of any state court appellate process. Wilson has offered no contrary authority. Thus, abstention under these doctrines is warranted despite the state trial court's recent rulings.

Dated: May 20, 2021

Respectfully submitted,

By: /s/ Davidde A. Stella  
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### **CERTIFICATE OF SERVICE**

I certify that on May 20, 2021, I filed the *foregoing*, along with this *Certificate of Service* with the Clerk of the Court via the court's electronic filing system which will send notice to all parties.

/s/ Davidde A. Stella  
Davidde A. Stella (P69948)